

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST

AirBoss Defense Group, LLC,

Plaintiff,

v.

United States,

Defendant.

No.: 24-cv-00365

MOTION FOR A PROTECTIVE ORDER

Pursuant to Rule 5.2(e) of the Rules of the United States Court of Federal Claims, Plaintiff, AirBoss Defense Group, LLC (“ADG”), hereby respectfully requests that the Court issue a standard Protective Order in this matter consistent with U.S. Court of Federal Claims Form 8, Protective Order in Procurement Protest Cases.

ADG believes that the issuance of a Protective Order is necessary to safeguard the confidentiality of competition-sensitive or otherwise protectable information likely to be disclosed orally or in writing during the course of this litigation.

ADG is likely to suffer serious competitive harm if such information is not adequately safeguarded.

Dated: March 7, 2024

Respectfully submitted,

/s/ Daniel P. Graham

Daniel P. Graham

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Counsel for AirBoss Defense Group, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2024, I caused a copy of the foregoing document to be electronically filed with the clerk using the Court's CM/ECF system. I further certify that I have served the foregoing document via Electronic Mail on the following:

United States Department of Justice
Commercial Litigation Branch
Civil Division, 8th Floor
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Washington, DC 20530
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s/ Daniel P. Graham
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